

PROTECO LANDFILL SUPERFUND SITE
Peñuelas, Puerto Rico
Site Reconnaissance Visit Summary

1. Introduction

The PROTECO Landfill Superfund Site potentially responsible parties' group (Group), pursuant to Paragraph 34(a) of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/ Feasibility Study (Order) and Section II (A), of the Statement of Work (SOW) attached to the Order as Appendix C, submits this summary of the Site Reconnaissance Visit (SRV) to the United States Environmental Protection Agency (EPA).

The SRV for the Proteco Landfill Superfund Site (Site) was held from approximately 10:00 AM until approximately 1:30 PM on Tuesday, May 3, 2022. The purpose of the SRV was to walk the Site, observe the current conditions and visually survey the reported locations of the Waste Units (WUs).

The following is a list of the EPA Representatives that attended the SRV:

- Zolymer Luna RPM, EPA Region 2;
- Omar Santiago, Department of Natural and Environmental Resources (DNER);
- Pascual Velázquez, DNER;
- Michael Valentino, CDM Smith, EPA's oversight contractor; and
- Guillermo Hernandez-Lopez, CDM Smith.

The following is a list of the Group representatives that attended the SRV:

- Mike Miller, de maximis;
- Dan Gainer, de maximis;
- Todd Kafka, Geosyntec;
- Jaime Feliciano, Geosyntec;
- Rachel Zajac-Fay, Geosyntec; and
- Raul Colon, Checkpoint.

2. Summary of the SRV Observations

The SRV participants met near the west gate and held a brief health and safety meeting at the beginning of the SRV. Heat stress, personal hydration and trip hazards while walking the Site were discussed in the meeting. The weather was hot (85°F) and sunny during the SRV.

There were seven (7) horses present inside the Site fence near the west gate area. The horses were observed by the EPA representatives and the Group representatives. The horses remained in the general area of the animal pen and Corrective Action Management Unit (CAMU 9) during the SRV. The EPA representatives were shown the animal pen, loading chute and a barbed wire corral that are located near the west gate inside the Site. The EPA representatives were shown the abandoned refrigerators which the livestock owner uses to water his animals. Photos 1 through 4 show the livestock pen, abandoned refrigerators and horses in the west gate area.

The Group representatives asked for EPA's assurance that they will follow through with the livestock owner to have the animals removed from the Site. Zolymer Luna stated she would contact the livestock owner. The horses remained away from the group during the SRV.

Jaime Feliciano explained to the group that the boundary stakes for each waste unit (WU) are located at the base of the cap slopes and are labeled. Jaime noted that earlier maps of the Site depicted the tops of the caps on all the WUs and did not capture the total extent of each cap because the base of the cap slopes had not been surveyed. The figures that will be included in the Scoping Planning and Technical Memorandum (SPTM) will show the total surveyed cap area for each WU.

The group discussed that clearing the vegetation and small trees with diameters less than four (4) inches across the Site prior to the SRV greatly improved access to all the WUs and the ability to see them and other Site features.

2.1 Waste Unit 5 (WU 5)

The SRV group began by walking from the west gate area to WU 5 which is reported to be a former drum burial area. Jaime Feliciano pointed out the survey stakes that marked the base of the WU to the group. Jaime also showed the remnants of an old electric transmission tower location on the north side of WU 5 to the group. Old insulators, guy wires and other related debris are present in this location. Photo 5 shows a general view of WU 5.

2.2 Waste Unit 1 (WU 1)

The group walked from WU 5 to WU 1. There is an old access gate present in the fence on the north side of WU 1. The broken strand of barbed wire observed by EPA on April 14, 2022, was adjacent to this gate. It would appear that this strand of wire was broken by a tree limb because the brush on the outside of the fence is too dense for the livestock to pass through to access it. The broken strand of wire will be repaired during a future Site inspection visit. Photo 6 shows a general view of WU 1.

EPA asked questions about the age of the passive gas vents in the WU 1 cap. Geosyntec responded that it is assumed that they were installed on or about 1999. Geosyntec stated that no construction records have been found for WU 1.

2.3 Waste Unit 2 and Waste Unit 3 (WU 2 and WU 3)

The group walked from WU 1 to WU 2 and WU 3. The 2019 HRS Report (Weston 2019) stated that WU 2 and WU 3 were to be capped at the same time and both WUs share a single continuous cap. WU 2 and WU 3 are at the highest elevation on the western portion of the Site. These WUs were reported to be drum disposal areas. Yellow flagging to the northeast of WU 2 and WU 3 which marked a potential PR Nightjar nesting area was shown to the group. Photo 7 shows a general view of WU 2 and WU 3.

2.4 Waste Unit 7 (WU 7)

The group walked from WU 2 and WU 3 to WU 7. WU 7 was reported (Weston 2019) to be a former neutralization pit. The neutralization pit was used to alter the pH level of potentially corrosive wastes by

dilution or chemical neutralization so the treated material could be stored and/or transported in compliance with transportation and/or environmental regulations. The neutralization pit was reported (Weston 2019) to have been excavated into the soil and did not have a liner. Photo 8 shows a general view of WU 7.

2.5 Waste Unit 14 (WU 14)

The group walked from WU 7 to WU 14. WU 14's eastern limit is the boundary with Ecosystems. WU 14 is the largest of the WUs and encompasses approximately eleven (11) acres. WU 14 is at the highest elevation on the eastern portion of the Site. WU 14 is reported (Weston 2019) to be a non-hazardous unit. Photo 9 shows a general view of WU 14.

2.6 Above Ground Storage Tanks (ASTs)

The group walked to the four (4) ASTs located across the access road from the southwest corner of WU 14 and to the east of the reported (Weston 2019) location for WU 8. The ASTs lie horizontally and have the approximate dimensions of 10-feet in diameter by 50-feet in length (estimated 30,000-gallon capacity each). In a September 23, 2005 Site Reassessment letter from the Puerto Rico Environmental Quality Board (EQB) to the USEPA included as an appendix in the 2019 HRS Report, it was reported that these ASTs were used to collect non-hazardous wastewaters and were emptied and cleaned before PROTECO ceased their operations. No attempt was made during the SRV to open or inspect the ASTs to determine if any liquids were present. Photo 10 shows a partial view of the AST area.

2.7 Waste Unit 8 (WU 8)

The group walked from the ASTs to the reported (Weston 2019) general location of WU 8. No visual indicators are present to define the location of WU 8. No survey data for WU 8 was contained in the HRS Report (Weston 2019). Since there is no physical/visual indication for the location of WU 8 it was not possible for Geosyntec to place survey stakes for this WU with any reasonable degree of certainty. A small mound of soil with apparent liner material is located to the west of the reported WU 8 location. However, at this time it is not possible to know if this material was associated with WU 8. Photo 11 shows a general view of reported location of WU 8.

2.8 Corrective Action Management Unit (CAMU) 9

The group walked from the WU 8 area past the livestock pen and barbed wire corral to CAMU 9. Horses were present near CAMU 9 during this portion of the SRV. CAMU 9 is reported (Weston 2019) to include the former oil evaporation pond and Waste Units (WUs) 10, 11, 12 and 16. All of these WUs are located under a single continuous cap. A small concrete structure located on the west flank of CAMU 9 is reported (Weston 2019) to have been used as a leachate pump house. Gas vents are located along the crest of CAMU 9. Photo 12 shows a general view of CAMU 9.

2.9 Waste Unit 13 (WU 13)

The group walked to WU 13 which is located to the east-southeast of CAMU 9. An erosion area is located on the west flank of WU 13. Liner material appears to be exposed in this erosion area (see photo 13).

2.10 Waste Unit (WU 17)

WU 17 was viewed by the group from the southern end of CAMU 9. The group could see that the vegetation had been cleared on top of WU 17. The vegetation on the western side slope of WU 17 was not cleared due to the steepness of the slope.

2.11 Sedimentation Ponds and Bypass Canal

The group left the Site and drove to the parking area near the two (2) sedimentation ponds south of the Site. New signs had been posted for the sedimentation ponds (see photographs 14 through 16). These signs were not posted by the Proteco Group. de maximis conveyed to EPA Proteco Group's continued concern about the bypass canal. The bypass canal was not constructed by the Proteco Group and redirects stormwater from the EC Waste facility and the [northern] portion of the Proteco Site away from the sedimentation ponds. Zolymer stated that she would like information about the 1999 Proteco Resource Conservation and Recovery Act (RCRA) closure plan(s) and any plans/information about the sedimentation ponds contained in those plan(s). Zolymer asked if the Valdeviesos (the landowners) had approved building the sedimentation pond(s), which could not be answered by the Group representatives that attended the SRV.

de maximis and Geosyntec walked to the bypass canal and took pictures to document the conditions on May 3, 2022 to compare them to photos taken on June 25, 2021. Photos 17 through 20 compare the condition of the bypass canal and the west abutment of the lower sedimentation dam from June 25, 2021 to May 3, 2022. The photos show that the bypass canal was still present on May 3, 2022 and is still functioning to channel stormwater from EC Waste and the [northern] portion of the Proteco Site so that it does not enter the sedimentation ponds. The photos also show the current condition of the west abutment of the lower (primary) sedimentation pond dam. The bypass canal and west abutment of the sedimentation pond dam appear to be in a worse condition than was previously reported to EPA in June 2021. It would appear that the stormwater which has flowed through the bypass canal since the June 2021 visit has eroded more soil material from the sediment pond dam's west abutment and the adjacent hillside.

The SRV concluded at approximately 1:30 PM and all parties left the Site.

3.0 Conclusion

This summary provides written and photographic documentation that the Group conducted the SRV as required by Section II (A), of the SOW attached to the Order as Appendix C on Tuesday, May 3, 2022. The EPA, Puerto Rico DNER and the EPA oversight contractor participated in the SRV. All the participants observed the presence of horses, a livestock pen, barbed wire corral, abandoned refrigerators and other debris near the west gate. All the participants walked the Site and viewed the general Site condition and the condition of the WUs located within the Site boundary. All the participants viewed the sedimentation ponds and could observe the presence of a stormwater bypass canal located on the west side of these ponds.

The next action required by Section II of the SOW is the submission to EPA of the Scoping Planning and Technical Memorandum (SPTM) sixty (60) days following the SRV.

PHOTOGRAPHS



Photo 1: Livestock Pen and Abandoned Refrigerators Near West Gate



Photo 2: Horses and Debris Near Livestock Pen in West gate Area



Photo 3: A Group of Six (6) Horses Near CAMU 9 and West Gate



Photo 4: Livestock Pen, Abandoned Refrigerators and Horses Near West Gate



Photo 5: General View of WU 5



Photo 6: General View of WU 1 (WU 2 and WU 3 in background)



Photo 7: General View of WU 2 and WU 3



Photo 8: General View of WU 7 (EC Waste in background)



Photo 9: General View of WU 14



Photo 10: Partial View of AST Area



Photo 11: General View of Reported Location of WU 8



Photo 12: General View of CAMU 9



Photo 13: View of Erosion Area on Side Slope of WU 13



Photo 14: Sign for Sedimentation Pond 1 (Lower Dam and Spillway Pipes in background)



Photo 15: Sign for Sedimentation Pond 2



Photo 16: Signs Near Sedimentation Ponds



Photo 17: Todd Kafka in Bypass Canal, May 3, 2022



Photo 18: Raul Colon in Bypass Canal, June 25, 2021



Photo 19: West Abutment Lower Sedimentation Pond, May 3, 2022



Photo 20: West Abutment Lower Sedimentation Pond, June 25, 2021